

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
BROWNSVILLE DIVISION**

UNITED STATES OF AMERICA

v.

**JAMES LAEL JENSEN
MAXWELL STERLING JENSEN
a/k/a “Max”
KELLY ANNE JENSEN
ZACHARY GOLDEN JENSEN**

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Case No. 1:25:cr-257

DEFENDANT MAXWELL STERLING JENSEN’S JENCKS MOTION

TO THE HONORABLE COURT:

Defendant Maxwell Sterling Jensen, through his counsel, Robert L. Guerra, Jr., files this Jencks Motion and in support would respectfully show:

Pursuant to Title 18 U.S.C.A Section 3500 (The Jencks Act) and Rule 26.2 of the F.R.Cr.P., Defendant respectfully moves the Court to Order the U.S. Attorney or his assistant to have available to Defendant the entirety of any written statement or statement as defined in Rule 26.2(f) of any witness, which were made at any time prior to the time such witness may testify in this case. This request for such statements includes, but is not limited to statements made before the Grand Jury. Defendant requests such statements for the purpose of cross-examining such witnesses when they testify on direct examination for the government and for rebuttal purposes during trial and any Suppression hearing.

Certificate of Conference

Pursuant to S.D. Tex. Cr. LR 12.2, counsel for Maxwell Sterling Jensen attempted to confer with Assistant United States Attorney Laura Garcia, as to her position in this Motion and as of the time of this filing was unable to confer.

Prayer

Defendant, therefore, respectfully requests that the Court grant this Motion. If the Court deems it necessary, Defendant requests the Court set a hearing to consider further evidence and arguments in this matter.

Respectfully submitted,

LAW OFFICE OF ROBERT GUERRA, PLLC

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MAXWELL STERLING JENSEN

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing document was served via e-mail on this 15th day of May 2025 to the following:

Ms. Laura Garcia Assistant United States Attorney United States Attorney's Office 600 E. Harrison, Rm 201 Brownsville, Texas 78520 Ph: (956) 548-2554 Email: laura.garcia@usdoj.gov	<input type="checkbox"/>	Regular Mail
	<input type="checkbox"/>	Certified Mail, RRR
	<input type="checkbox"/>	Hand Delivery
	<input type="checkbox"/>	Facsimile
	<input checked="" type="checkbox"/>	Electronic Mail

/s/ Robert L. Guerra, Jr.
ROBERT L. GUERRA, JR.